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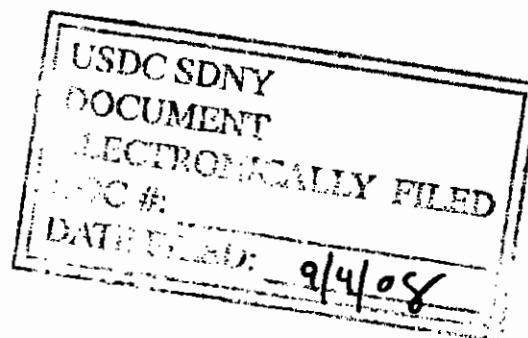
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September 3, 2008

BY FACSIMILE (212-805-7906)

The Honorable Denny Chin
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Robert L. Geltzer, as Chapter 7 Trustee for 1st Rochdale
Cooperative Group, Ltd. vs. Altman, et al.
- 07 CV 7852 (DC)

Honorable Sir:

We write on behalf of the plaintiff, Robert L. Geltzer, as Chapter 7 Trustee (the "Bankruptcy Trustee") for 1st Rochdale Cooperative Group, Ltd. (the "Debtor"), to request respectfully an adjournment until January 16, 2009 of the present September 17, 2008 deadline for completion of discovery in the above-referenced adversary proceeding (the "Adversary Proceeding") presently pending before Your Honor. The Bankruptcy Trustee requests this adjournment, which is the first adjournment that has been requested with respect to discovery in the Adversary Proceeding, for two reasons.

First, the undersigned has left the firm of Bryan Cave LLP ("Bryan Cave"), which had been serving as counsel to the Bankruptcy Trustee both in the Debtor's Chapter 7 bankruptcy case pending before Bankruptcy Judge Prudence C. Beatty and in the Adversary Proceeding, and has become a partner of Squire, Sanders & Dempsey, L.L.P. ("Squire, Sanders"). The Trustee communicated to both firms his desire that Squire, Sanders substitute for Bryan Cave as the Trustee's counsel for all purposes. Accordingly, Squire Sanders had to prepare a retention application on behalf of the Trustee seeking to effectuate that substitution. The Order approving the retention of Squire, Sanders was signed by Bankruptcy Judge Beatty yesterday September 2, 2008.

Second, there is presently pending adjudication by Your Honor the motion of the defendants Francis Connolly and Joan Ramer, as co-executors of the Estate of Allen Thurgood (the "Thurgood Estate"), to dismiss certain (Counts Three and Four), but not all of, the counts asserted in the Trustee's Complaint in the Adversary Proceeding as against the Thurgood Estate. Thus, Your Honor's ruling with

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GRANTED, but only until 11/17/08. 9/4/08
SO ORDERED. *[Signature]*
USDJ

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SQUIRE, SANDERS & DEMPSEY L.L.P.

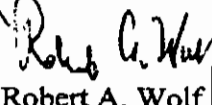
respect to the Thurgood Estate's motion will dictate whether discovery in the Adversary Proceeding need include discovery with respect to Counts Three and Four.

Accordingly, we respectfully submit that a first-time adjournment of the deadline for completion of discovery in the Adversary Proceeding is warranted. Such an adjournment will enable the parties to have reasonably sufficient time within which to complete deposition, document and interrogatory discovery that has already been noticed, as well as to conduct the depositions of certain third parties who will likely be subpoenaed.

The remaining defendants in the Adversary Proceeding are Gregory Wortham ("Wortham") and the Thurgood Estate. Counsel for Wortham, Todd E. Duffy, Esq., and counsel for the Thurgood Estate, Jonathan D. Pressment, Esq., have advised us that their respective clients consent to this adjournment request.

We thank Your Honor for your time and consideration respecting this matter.

Respectfully submitted,


Robert A. Wolf

cc: Jonathan D. Pressment, Esq. (By fax)
Todd E. Duffy, Esq. (By fax)